

SELF-AUDIT / SELF DISCLOSURE AGREEMENT BETWEEN
THE SCHOOL DISTRICT OF PHILADELPHIA
AND
THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III

I. INTRODUCTION

The School District of Philadelphia (School District) wishes to obtain the benefits of the policy of the United States Environmental Protection Agency (EPA) entitled "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy); and,

To obtain the benefits of the Policy, the School District is willing to conduct audits of its compliance with the regulations set forth in Sections III and IV below, to disclose any violations found to the EPA and to timely correct such violations under the appropriate regulations; and,

The School Reform Commission, by SRC Resolution No. A-6, dated September 20, 2006, attached hereto at Exhibit A, has approved this Self-Audit/Self Disclosure Agreement (Agreement); and,

The performance of the audits by the School District and the disclosure and correction of any regulatory violations found, will implement the purpose of the Policy to "enhance the protection of human health and the environment by encouraging regulated entities to voluntarily discover, disclose, correct and prevent violations of Federal environmental law;" and,

The performance of the audits by the School District and the disclosure and correction of any regulatory violations found, will benefit EPA by allowing it to more efficiently utilize its resources in obtaining regulatory compliance within its jurisdiction; and,

To obtain the benefits of the performance by the School District of the above audits, and the disclosure and correction of any violations found, EPA is willing to enter into an agreement with the School District providing for such audits to implement the Policy.

Accordingly, the School District and EPA agree as follows, with the understanding that this Agreement is governed by the terms of the Policy, except to the extent that those terms are explicitly modified below:

II. SCOPE OF THE AUDIT

The School District will conduct an audit to gauge its compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for all of the schools that are within the School District (Asbestos Audit). In addition, the School District will conduct a comprehensive multimedia audit for certain schools within the School District (Multimedia Audit). Both of these undertakings are further outlined below.

III. ASBESTOS AUDIT

A. FACILITIES TO BE AUDITED

For purposes of conducting the Asbestos Audit, the School District will audit all of the schools within the School District, as listed in Exhibit B to this Agreement.

B. STATUTORY AND REGULATORY AREAS FOR REVIEW

The Asbestos Audit will determine compliance with the Toxic Substances Control Act (TSCA), Subchapter II (the Asbestos Hazard Emergency Response Act or AHERA), 15 U.S.C. §§ 2641 to 2646, and the federal regulations implementing AHERA as set forth at 40 C.F.R. Part 763 Subpart E. The Asbestos Audit will at a minimum assess whether each school listed in Exhibit B has:

1. An up-to-date Inspection/Re-inspection schedule that complies with the requirements found at 40 C.F.R. § 763.80;
2. An up-to-date Management Plan that complies with the requirements of 40 C.F.R. § 763.93;
3. A training and periodic surveillance schedule that complies with the requirements found at 40 C.F.R. § 763.92;
4. An Operation and Maintenance plan that complies with the requirements found at 40 C.F.R. § 763.91;
5. A "Designated Person" that complies with the requirements found at 40 C.F.R. § 763.84(g);
6. A plan to provide annual notifications as required 40 C.F.R. § 763.93(g)(4); and
7. A record keeping plan that complies with the requirements found at 40 C.F.R. § 763.94.

C. DISCLOSURE

The School District shall disclose all regulatory violations discovered during the Asbestos Audit. The School District will disclose these violations to the EPA, in accordance with the Policy, in written disclosure reports to be submitted in accordance with the schedule set forth in Section III.D.2, below. Each disclosure report shall contain a summary of the audit findings of noncompliance, including statutory and regulatory requirements violated and the dates of non-compliance, with reference to each violation disclosed the following additional

information: the corrective action to be taken by the School District pursuant to Section III.E., below, to abate the violation; the status of the corrective action; and the means taken by the School District to prevent recurrence of the violation. All disclosure reports will be submitted by the scheduled date and EPA agrees to waive the twenty-one (21) day disclosure requirement provided for in the Policy.

Once the corrective action designed to abate a particular violation has been completed, and a report submitted to the EPA notifying it of the completion of the corrective action, no further reporting is required by this Agreement on that violation, or the status of the corrective action for such violation

D. SCHEDULE

1. AUDITORS

Within sixty (60) days of the effective date of this Agreement, the School District will select its auditor(s) for the Asbestos Audit. At a minimum, the auditor(s) selected by Respondent for performance of the Audit shall:

- a. be properly trained and possess valid current accreditation and licensure under an approved State accreditation program;
- b. have experienced staff for the performance of such audits;
- c. not perform any Asbestos Audit activities with regard to prior work subject to the Asbestos Audit performed for the School District; and
- d. not have any conflict of interest that will compromise, in any way, the performance of the Asbestos Audit.

2. TIMING

The School District shall complete asbestos audits for no less than thirty (30) schools per calendar quarter (January through March, April through June, July through September, October through December) beginning with the first full calendar quarter following the execution of this Agreement. The School District shall submit the report required by Section III.C. twenty (20) days following the end of a quarter (i.e., April 20, July 20, October 20, and January 20).

Based on the above schedule, it is anticipated that the School District will complete the Asbestos Audit within three (3) years of commencement of the Asbestos Audit. Following the completion of the Asbestos Audit, the School District shall remain obligated to complete the corrective action necessary to abate any violations and to report to the EPA in writing the completion of any corrective action, previously unreported, within thirty days after the corrective action has been completed.

E. CORRECTIVE ACTION

The School District shall correct each violation identified during the Asbestos Audit and shall take those steps necessary to prevent the recurrence of each such violation. Whenever possible, the School District shall correct any violations identified during the Asbestos Audit within sixty (60) days of the discovery. In those instances in which the School District is unable to correct an identified violation within the sixty (60) day deadline, it shall request an extension of time from the EPA in writing and provide an abatement schedule, accompanied by a justification of the requested extension. Any extension of the sixty (60) day abatement period shall be subject to the EPA approval and such approval shall not be unreasonably withheld.

F. CONTACT PERSONS

The School District designates as its "Contact Person," to be the recipient of all communications from EPA concerning the Asbestos Audit, the following:

Francine Locke, MS
Environmental Manager
Office of Capital Programs
The School District of Philadelphia
440 North Broad Street, 3rd Floor
Philadelphia, PA 19130
Phone: 215-400-5213
Fax: 215-400-4751
flocke@phila.k12.pa.us

With a copy to:

Elizabeth C. Gutman, Esquire
Assistant General Counsel
The School District of Philadelphia
440 North Broad Street, Suite 313
Philadelphia, PA 19130
Phone: 215-400-5154
Fax: 215-400-4121
egutman@phila.k12.pa.us

The EPA designates the following individual as its Contact Person for purposes of the Asbestos Audit:

Kyla L. Townsend-McIntyre
U.S. Environmental Protection Agency, Region III
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215-814-2045
Fax: 215-814-3113
townsend.kyla@epa.gov

The parties may re-designate their Contact Persons by notifying the other in writing, within ten (10) calendars days of such change.

IV. MULTIMEDIA AUDIT

A. FACILITIES TO BE AUDITED

The School District shall conduct a Multimedia Audit of its compliance with the regulations cited below in subsections IV.B. 1-8. Except as noted below, the Multimedia Audit will encompass all schools listed below, which are included in the School District's Capital Projects Fund list for 2006-2007 through 2011-2012:

Elementary/Middle Schools :

5200 Alexander Adaire School
8200 Ethan Allen School
1460 Add B. Anderson School
4290 Guion S. Bluford School
5210 Henry A. Brown School
1230 William C. Bryant School
5220 George Clymer School
4510 Frederick Douglas School
5250 Paul L. Dunbar School
7310 Feltonville School
5290 Joseph C. Ferguson School
4530 Edward Gideon School
1290 Andrew Hamilton School
5320 John F. Hartranft School
1330 Samuel B. Huey School
5335 William H. Hunter School
4560 William D. Kelley School
2510 Andrew Jackson School
5100 John Paul Jones Middle School

4320 Robert E. Lamberton School
 6160 Ada H. Lewis Middle School
 1350 William C. Longstreth School
 7360 John Marshall School
 4570 Gen. George C. Meade School
 6320 Thomas Mifflin School
 2390 Robert Morris School
 1150 George Pepper Middle School
 2420 Gen. John F. Reynolds School
 6110 Theodore Roosevelt Middle School
 8150 Benjamin Rush Middle School
 6380 Shawmont School
 6390 Edward Steel School
 5140 Stoddard-Fleischer Middle School
 5560 Spring Garden School
 1160 John P. Turner Middle School
 2490 Laura W. Waring School
 1420 Martha Washington School
 4430 John G. Whittier School
 5440 Frances E. Willard School

High Schools:

4030 George Washington Carver High School
 6010 Central High School
 4060 Murrell Dobbins High School
 7120 Samuel Fels High School
 4110 Thomas Fitzsimons High School
 2290 Franklin Learning Center
 6020 Germantown High School
 4010 Simon Gratz High School
 5010 Kensington High School
 8010 Abraham Lincoln High School
 6060 Martin Luther King High School
 5060 Jules E. Matsbaum High School
 7020 Olney High School
 5040 William Penn High School
 4150 E. Washington Rhodes High School
 6030 Roxborough High School
 6040 William B. Saul High School of Agriculture Sciences
 1100 William L. Sayre High School
 4140 Strawberry Mansion High School
 8030 George Washington High School
 1020 West Philadelphia High School
 1080 University City High School
 2130 Robert Vaux High School

If the School District believes that a change to the Capital Projects Fund list necessitates a change to the above list of schools, the School District may request such a change. Any changes to the above list, however, must be made by mutual agreement of the School District and the EPA and must be made in writing by the persons designated as Contact Persons in Section IV.F. of this Agreement.

B. STATUTORY AND REGULATORY AREAS FOR REVIEW

The School District will audit compliance with the following federal and state regulatory programs. Where appropriate, reference is made to both the federal program and, if applicable, the authorized or approved Pennsylvania regulatory program:

1. Clean Air Act: Standards of Performance for New Stationary Sources (40 C.F.R. Part 60); National Emission Standards for Hazardous Air Pollutants (40 C.F.R. Part 61); National Emission Standards for Hazardous Air Pollutants for Source Categories (40 C.F.R. Part 63); Chemical Accident Prevention Provisions (40 C.F.R. Part 68); Title V Permits; Protection of Stratospheric Ozone (40 C.F.R. Part 82). The Pennsylvania State Implementation Plan.
2. Clean Water Act: Spill Prevention, Control, and Countermeasures (40 C.F.R. Part 112); The Pennsylvania Discharge Elimination System Permitting, Monitoring and Compliance regulations at 25 Pa. Code § 92.1, et seq. (The National Pollutant Discharge Elimination System Permits, including storm water management (40 C.F.R. Part 122)); General Pretreatment Regulations (40 C.F.R. Part 403), City of Philadelphia Wastewater Control Regulations.
3. Safe Drinking Water Act: State and National Primary and Secondary Drinking Water Regulations (25 Pa. Code Chapter 109 and 40 C.F.R. Part 141 and 143).
4. Federal Insecticide, Fungicide and Rodenticide Act: Worker Protection Standard (40 C.F.R. Part 170).
5. Resource Conservation and Recovery Act: The provisions of Pennsylvania's hazardous waste management program, most recently reauthorized by EPA on January 20, 2004, and set forth at 25 Pa. Code § 260.a.1., et seq., and the provisions of Pennsylvania's Underground Storage Tank program, approved on September 11, 2003, and set forth at 25 Pa. Code Chapter 245 (Hazardous Waste Management System, Used Oil Handling, Underground Storage Tanks (40 C.F.R. Parts 260-266, 268, 273, 279, 280)).
6. Comprehensive Environmental Response, Compensation and Liability Act and Emergency Planning, and Community Right-to-Know Act: Designation, Reportable Quantities, and Notification (40 C.F.R. Part 302); Emergency Planning and Notification (40 C.F.R. Part 355).

7. Toxic Substances Control Act: Polychlorinated Biphenyls ("PCBs")
Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions (40 C.F.R Part 761).

8. The audits shall include, but not be limited to, an evaluation of each school's: (a) operating procedures and practices, (b) wastewater pollutants, storm water pollutants, wastewater and storm water treatment, and wastewater and storm water discharges, (c) oil storage capacity and storage methods, (d) oil spill prevention control and countermeasure plans, (e) air pollutant emissions, emission controls, and maintenance practices for any such controls and compliance with pre-construction requirements, (f) solid and hazardous waste generation, handling, storage and disposal, (g) management of PCBs, (h) monitoring, record keeping and reporting procedures and, (i) emergency planning procedures, as these various activities relate to the School District's compliance with statutes and regulations listed in paragraphs 1-7 above, and with the School District's compliance with the terms and conditions of any permits issued under any of the listed statutes and regulations. In addition, the School District will evaluate recycling and pollution prevention opportunities within its schools, but shall not be under any obligation to implement any recycling or pollution prevention measures.

C. DISCLOSURE

The School District shall disclose all regulatory violations discovered during the Multimedia Audit. The School District will disclose these violations to the EPA, in accordance with the Policy, in written disclosure reports to be submitted in accordance with the schedule set forth in Section IV.D.2., below. Each disclosure report shall contain a summary of the audit findings of noncompliance, including statutory and regulatory requirements violated and the dates of non-compliance, with reference to each violation disclosed the following additional information: the corrective action to be taken by the School District pursuant to Section IV.E., below, to abate the violation; the status of the corrective action; and the means taken by the School District to prevent recurrence of the violation. All disclosure reports will be submitted by the scheduled date and EPA agrees to waive the 21 day disclosure requirement provided for in the Policy.

Once the corrective action designed to abate a particular violation has been completed, and a report submitted to the EPA notifying it of the completion of the corrective action, no further reporting is required by this Agreement on that violation, or the status of the corrective action for such violation.

D. SCHEDULE

1. AUDITORS

Within sixty (60) days of the effective date of this Agreement, the School District will select its auditor(s) for the Multimedia Audit. At a minimum, the auditor(s) selected by Respondent for performance of the Multimedia Audit shall:

- a. have a bachelor's degree and no less than 3 years experience in performing compliance audits for the environmental statutes and regulations listed in Section IV.B., above;
- b. have a trained and experienced staff for the performance of such audits;
- c. not perform any Multimedia Audit activities with regard to prior work subject to the Multimedia Audit performed for the School District; and
- d. not have any conflict of interest that will compromise, in any way, the performance of the Multimedia Audit.

2. TIMING

The School District shall complete multimedia audits for no less than four (4) schools per calendar quarter (January through March, April through June, July through September, October through December) beginning with the first full calendar quarter following the selection of auditors for the Multimedia Audit. The School District shall submit the report required by Section IV.C. twenty (20) days following the end of a quarter (i.e., April 20, July 20, October 20, and January 20).

Based on the above schedule, it is anticipated that the School District will complete the Multimedia Audit within four (4) years of commencement of the Multimedia Audit. Following completion of the Multimedia Audit, the School District shall remain obligated to complete the corrective action necessary to abate any violations and to report to the EPA in writing the completion of any corrective action, previously unreported, within thirty days after the corrective action has been completed.

E. CORRECTIVE ACTION

The School District shall correct each violation identified during the Multimedia Audit and shall take those steps necessary to prevent the recurrence of each such violation. Whenever possible, the School District shall correct any violations identified during the Multimedia Audit within sixty (60) days of the discovery. In those instances in which the School District is unable to correct an identified violation within the sixty (60) day deadline, it shall request an extension of time from the EPA in writing and provide an abatement schedule, accompanied by a justification of the requested extension. Any extension of the sixty (60) day abatement period shall be subject to the EPA approval and such approval shall not be unreasonably withheld.

F. CONTACT PERSONS

The School District designates as its "Contact Person," to be the recipient of all communications from EPA concerning the Multimedia Audit, the following:

Francine Locke, MS
Environmental Manager
Office of Capital Programs
School District of Philadelphia
440 North Broad Street
Philadelphia, PA
Phone: 215-400-5213
Fax: 215-400-4751
flocke@phila.k12.pa.us

With a copy to:

Elizabeth C. Gutman, Esquire
Assistant General Counsel
The School District of Philadelphia
440 North Broad Street, Suite 313
Philadelphia, PA 19130
Phone: 215-400-5154
Fax: 215-400-4121
egutman@phila.k12.pa.us

The EPA designates the following individuals as its Contact Persons for purposes of the Multimedia Audit:

Debbie Moody
U.S. Environmental Protection Agency, Region III
Office of Enforcement Compliance and Environmental Justice (3EC00)
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215-814-2394
Fax: 215-814-2905
moody.debbie@epa.gov

Robert W. Stroud
U.S. Environmental Protection Agency, Region III
Federal Facilities Branch (3HS13)
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215-814-3366
Fax: 215-814-3051
stroud.robert@epa.gov

The parties may re-designate their Contact Persons by notifying the other in writing, within ten (10) calendars days of such change.

VI. CIVIL PENALTIES

A. Gravity Based Penalties. Except as provided in Section II.D.8 of the Policy, the EPA will not impose gravity based penalties for violations that School District discloses pursuant to this Agreement, provided that the applicable provisions of the Policy and this Agreement are met.

B. Economic Benefit Penalties - The EPA may impose economic benefit penalties, but acknowledges that the School District will expend significant resources to undertake the audits and to correct any deficiencies discovered in the course of the audits. The EPA recognizes that the School District voluntary audit efforts will conserve the EPA's resources. The EPA, in its sole discretion, shall notify the School District if it believes that the imposition of an economic benefit penalty may be appropriate and shall take into consideration all appropriate and most likely means for coming into compliance when calculating potential economic benefit penalties with respect to any disclosed violations, provided that the method utilized complies with EPA policies and regulatory requirements.

VII. EPA INSPECTIONS

Nothing in this Agreement shall limit the authority of EPA to conduct any inspections or information gathering under any applicable Federal law. Any civil violation discovered in a school or satellite facility within the scope of the audits, which was scheduled to be audited subsequent to such discovery, shall be treated as a disclosure by the School District and resolved under the terms of the Policy and this Agreement. Additionally, EPA retains the right to conduct during the audits the inspections set forth below:

A. Oversight Inspections - Where the School District has reported a violation which requires corrective action in the nature of a clean up of contaminated soil or water, EPA shall have the right to conduct inspections at the corrective action site for the purpose of overseeing or monitoring the cleanup to assure appropriate correction of the violation.

B. Confirmation Inspections - Where the School District has disclosed a violation, selected a corrective action plan and reported that the plan has been completed and the violation cured, EPA shall have the right to inspect the relevant school or satellite facility to assure that the violation has in fact been corrected, or to require further appropriate corrective action, if it has not.

VIII. MISCELLANEOUS PROVISIONS

A. Notification and Certification of Disclosure Reports - The School District designates as its "responsible official," responsible for submitting disclosure reports (with respect to both the Asbestos Audit and the Multimedia Audit) to EPA, the following individual:

Francine Locke, MS
Environmental Manager
Office of Capital Programs
School District of Philadelphia
440 North Broad Street
Philadelphia, PA
Phone: 215-400-5213
Fax: 215-400-4751
flocke@phila.k12.pa.us

The Responsible Official shall certify that each disclosure report submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

B. Compliance with Law and Regulation - Neither the existence of this Agreement, nor compliance with this Agreement relieves the School District of its obligation of continued compliance with the regulations covered by this Agreement, and all other federal, state and local laws, permits and regulations.

C. Reservation of Rights - EPA reserves its rights to proceed against the School District for all violations outside the scope of the audits, and violations within the scope of the audits that were not timely or accurately reported or corrected. EPA reserves the right to commence action against any person, including the School District, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This Agreement is not intended, and shall not be construed, to resolve any claim for criminal sanctions now pending or that may be sought in the future, and shall not limit the right of the United States to pursue criminal sanctions for any violation of law.

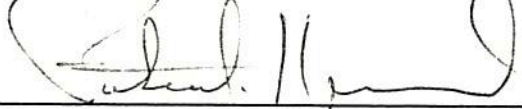
D. No Third Party Rights - This Agreement does not in any way grant or otherwise create any rights, obligations, responsibilities, expectations, or benefits for any third party.

E. Authority of Signatories - The signatories hereto represent that they have the authority to bind the parties.

F. Modification - This Agreement may be modified by a writing signed by both parties.

G. Effective Date - This Agreement is effective upon signature by both the School District and EPA.

For The School District of Philadelphia:



Patrick Henwood
Director of Capital Programs
The School District of Philadelphia

Approved as to form only:



Attorney for The School District of
Philadelphia

Date: 2/2/07

For EPA:



for Donald S. Welsh, Regional Administrator
U.S. Environmental Protection Agency, Region III

Date: 2/9/07

EXHIBIT A

To: Members of The School Reform Commission
From: Walter Dillinger, Sr Vice Pres&Gen Mgr,Fac&Sch
Date: September 20, 2006
Subject: U.S. Environmental Protection Agency - Consent Agreement and Final Order Self-Audit Agreement

A-6
September 20, 2006

Resolved, that the School Reform Commission authorizes the School District of Philadelphia through the Director of Capital Programs or his designee: (i) to execute a Consent Agreement and Final Order with the US Environmental Protection Agency ("EPA") in connection with certain alleged Asbestos Hazard Emergency Response Act ("AHERA") violations at nine schools and to pay up to \$46,422 in penalties for such violations that occurred in late 2004 and early 2005; (ii) to execute a Self-Audit Agreement with the EPA in connection with the School District auditing certain schools in the Capital Program for compliance with applicable environmental laws; and, (iii) to enter into such other documents necessary to further the intent of this Resolution.

Description of Project

A. AHERA Consent Decree and Final Order

The US Environmental Protection Agency ("EPA") has issued a Consent Agreement and Final Order ("CAFO") to settle certain alleged violations of the Asbestos Hazard Emergency Response Act ("AHERA"), and the federal regulations implementing AHERA, involving the alleged failure of the School District to provide certain required annual notifications at nine schools in late 2004 and early 2005. The CAFO also resolves civil claims against the School District of Philadelphia arising from such alleged violations.

The EPA has agreed to refrain from filing a complaint against the School District of Philadelphia for such alleged violations if the School District enters into the CAFO. Under the CAFO, the EPA has assessed the School District with \$46,422 in penalties for the alleged AHERA violations at nine schools. Such penalties shall be reduced if the School District demonstrates that it has spent School District funds to correct such violations or on other AHERA compliance issues since late 2004 and early 2005.

B. Environmental Self-Audit Agreement

The EPA has requested that the School District of Philadelphia enter into a Self-Audit Agreement with the EPA under which the School District will audit its compliance at certain schools in the Capital Program with certain applicable environmental laws, disclose any violations found to the EPA, and timely correct such violations under the appropriate regulations. The School District would be one of the first school districts in the country to voluntarily audit its own facilities and save significant monetary penalties, rather than having EPA audit the School District's facilities for compliance with applicable environmental laws.

See Attachment

Justification

If this Resolution is not approved, the EPA will file a complaint against the School District of Philadelphia for the alleged violations of AHERA at the nine schools. Additionally, if this resolution is not approved and if the School District of Philadelphia does not enter into the Self-Audit Agreement, the EPA may choose to proceed with an EPA-audit rather than a Self-Audit that could result in significant monetary penalties to the School District.

See Attachment.

M/WBE Participation Level

MWBE participation is not applicable for this resolution.

Evaluation Method

The School District of Philadelphia will conduct a self audit of schools in the Capital Program.

We will be one of the first school districts in the country to voluntarily audit its own facilities and save significant monetary penalties.

Grants Accepted

Not Applicable - To Be Determined

ABC Code(s)

Capital - \$46,422.00 - 8A03-065-9AL0-4220-3411

Prepared by: Renee Evans, Confidential Secy B, Capital Projects Office

Approved by: Miles Shore, Acting General Counsel , Wayne Harris, Budget Director , Folasade Olanipekun, Chief Financial Officer

Prepared by: Renee Evans
Confidential Secy B
08/23/2006

Approved by: Miles Shore
Acting General Counsel
08/23/2006

Wayne Harris
Budget Director
08/23/2006

Folasade Olanipekun
Chief Financial Officer
08/23/2006

EXHIBIT B

ULCS #	SCHOOL
1010	Bartram, John (Sr)
1011	Bartram Freshman Ctr Annex
1012	Bartram Comm. Annex
1014	Paul Robeson H.S. (Bartram HR)
1016	Motivation H.S. (Bartram)
1019	Bartram, Ath. Field (Sr)
1020	West Philadelphia (Sr)
1022	West Philadelphia Tech. Ctr.
1029	West Philadelphia Athl. Fld.
1030	School of the Future (Microsoft)
1070	Parkway/MYA (West Phila. Catholic)
1080	University City High
1100	Sayre, William L.(Jr.) H.S.
1101	Sayre Pool
1110	Shaw, Anna Howard (Jr)
1120	Sulzberger, Mayer (Jr)
1130	Tilden, William T. (Jr.)
1150	Pepper, Middle
1160	Turner Middle
1200	Barry, Comm. John E.S. (NEW BLDG)
1201	Barry Annex (Grtr St. Matthew)
1230	Bryant, Wm. Cullen E.S.
1250	Catherine, Jos. W.
1251	Catherine Annex (St. Vincents) (New)
1260	Comegys, Benj. B.
1270	Drew, Charles, R.
1271	Drew (Walnut Center)
1280	Penn Alexander
1290	Hamilton, Andrew E.S.
1300	Harrington, A. D.
1301	Harrington Annex
1310	Harrity, William F.
1330	Huey, Samuel B. E.S.
1340	Lea, Henry C.
1350	Longstreth, William C.
1360	McMichael, Morton
1370	Mitchell, S. Weir
1380	Morton, Thomas G.
1381	Morton Annex (Our Lady of Loretto)
1390	Powel, Samuel
1391	Powel Annex (Metropolitan Baptist)
1400	Patterson, John M.
1410	Rhoads, James
1420	Washington, Martha
1430	Wilson, Alexander

ULCS #	SCHOOL
1440	Penrose
1441	Penrose Little School House
1460	Anderson, Add. B.
1470	Locke, Alain
1490	Blankenburg, Rudolph
1590	Miller, E. S.
2000	South Phila. High (Sr)
2009	South Phila. Ath. Field
2010	Franklin, Benjamin HS
2020	Creative & Performing Arts
2090	Bok, AVT
2110	Barratt, Norris S. (Jr) E.S.
2120	Vare, Edwin H. (Jr)
2130	Vaux, Robert (Jr) H.S.
2140	Masterman, Julia R. (Jr)
2150	Thomas, George C.
2160	Furness High School
2190	Fell, D. Newlin
2200	Alcorn, James
2202	Alcorn Annex (Reed House)
2210	Bache
2240	Bregy, F. Amedee
2260	Childs, Geo. W.
2290	Franklin Learning Center
2310	Boone (Kane)
2320	Girard, Stephen
2321	Girard Annex (Poe) GAMP
2340	McCall, General George A.
2360	Martin, Willis & Eliz.
2371	McDaniel Annex (King of Peace)
2372	McDaniel Anx (St. Edmonds) (3/14/06-In Use)
2380	Meredith, Wm.
2390	Morris, Robert E.S.
2391	Morris Annex (Slavko Properties)(New)
2400	Peirce, Wm. S.
2401	Pierce Annex (St. Rita)
2420	Reynolds, Gen. John F. E.S.
2430	Palumbo(Bartlett)
2440	Smith, Walter George
2450	Stanton, Edwin M.
2470	Greenfield, A.
2480	Arthur, Chester A.
2481	Arthur Annex (St. Charles)
2490	Waring, Laura W.
2510	Jackson, Andrew

ULCS #	SCHOOL
2520	Jenks, Abram S.
2530	Youth Study Center
2540	Key, Francis Scott
2551	Kennedy Annex
2580	Kirkbride
2590	Nebinger, George W.
2630	Sharswood, George
2640	Southwark
2650	Franklin Institute-Science Leadership Academy
2670	Constitution H.S. (7th & Market)
2690	Taggart, John H.
2720	Vare, Abigail
2730	Washington, Geo. ES
4010	Gratz, Simon (Sr)
4012	Marcus Foster Field
4013	Marcus Foster Pool
4020	Overbrook Sr. High
4030	H S for Eng.& Sci. (Carver)
4060	Dobbins, Murrell (Sr)
4100	Beeber Jr High/Wynnfield
4110	FitzSimons, Thomas
4120	Gillespie, Elizabeth D. (Jr)
4140	Strawberry Mansion
4150	Rhodes, E. Washington
4210	Daroff, Samuel
4220	Blaine, James G.
4240	Cassidy, Lewis C.
4241	Cassidy Annex (Good Shepherd)
4260	Cleveland, Grover
4270	Dick, William
4280	Gompers, Samuel
4290	Bluford, Guion (Hanna)
4300	Heston, Edward
4310	Kenderton
4320	Lamberton, Robert E.
4322	Lamberton Little School House (New)
4330	Leidy, Joseph
4340	Mann, William B.
4370	Overbrook E.S.
4380	Peirce, T. M.
4390	Pratt, Anna B.
4400	Stanton, M. Hall
4420	Walton, Rudolph S.
4430	Whittier, John G.
4440	Allen, Dr. Ethel (Lehigh Avenue) E.S.

ULCS #	SCHOOL
4450	Hill, Leslie Pinckney
4460	Duckrey, Tanner
4470	Wright, Richard R.
4480	Overbrook Ed. Ctr (St. Callistus)
4510	Douglass, Frederick
4530	Gideon, Edward
4560	Kelley, Wm. D. E.S.
4570	Meade, Geo. G. E.S.
5010	Kensington High (Sr)
5011	Kensington Annex (Hagert&Coral Sts.)
5020	New Edison (Front & Luzerne)
5021	Masland Bldg.
5023	Dobbins-Franklin Athletic Fld.
5040	Penn, William
5041	Penn Pool (Part of #5040)
5060	Mastbaum, Jules E. (Sr)
5061	Willard Annex (Mastbaum) (See 5441)
5071	Parkway Program Center City
5074	Parkway (New Covenant-shared w/Amy NW)
5080	Parkway Center City (9 S. 12th St.)
5100	Jones, John Paul (Jr)
5110	Penn Treaty (Jr) High
5120	Stetson, John B.
5121	Stetson Annex (Not in Use)
5130	Wanamaker, John (Jr) H.S.
5140	Fleisher (Stoddart)
5150	H S for Intl Affairs (Bodine)
5200	Adaire, Alexander
5210	Brown, Henry A.
5218	Rivera Child Dvlpmnt Center (See 5460)
5220	Clymer, George E.S.
5230	Conwell Middle
5231	Conwell Annex
5240	Douglas, Stephen A.
5250	Dunbar, Paul Lawrence E.S.
5260	Elkin, Lewis
5262	Elkin Little School House
5270	Elverson Military Academy
5280	Fairhill
5290	Ferguson, Joseph C. E.S.
5300	Hackett, Horatio B.
5310	Harrison, Wm. Henry E.S.
5320	Hartranft, John F. E.S.
5335	New Hunter
5340	Ludlow, James R.

ULCS #	SCHOOL
5341	Ludlow Community Center
5350	McKinley, William
5370	Moffet
5380	Community Ed. Partners H.S. (Muhr, Simon)
5390	Potter, Thomas
5400	Richmond
5410	Sheppard, Issac A.
5411	Sheppard Annex (Buena Vista)(CLOSED)
5420	Welsh, John E.S.
5421	Welsh Annex (Not in Use)(See 5460)
5440	Willard, Frances E.
5441	Willard Annex A (Old 5061)
5450	Carroll, Charles
5460	Rivera/Lehigh Park Annex (Welsh Annex)
5470	Cramp, William
5472	Cramp Anx (St. Hugh) (NO Floor Plans)
5480	Kearny, Gen. Philip
5490	Cayuga (St. Henry's)
5491	Cayuga Annex (Now Anx to Olney ES)
5500	Thurgood Marshall ES
5530	Sheridan, Philip H.
5531	Sheridan Annex (Ascension of Our Lord) (Open 6/06)
5560	Spring Garden (Corman)
5590	Webster, John H.
5591	Webster Little School House
5680	Munoz-Marin, Luis
5690	New Hunter School (See 5335)
5760	Fairhill Annex
5980	New E.S. G & Hunting Park Ave
6010	Central High (Sr)
6019	Central High (Sr)(Ath. Fld)
6020	Germantown High (Sr)
6029	Ben Johnson Stadium(Fld House)
6030	Roxborough High (Sr)
6039	Roxborough (Athl. Fld)
6040	Saul, Walter B. (Sr)
6041	Manatawana Farms
6050	High School for Girls, (Sr.)
6060	King, Martin L. (Sr)
6090	Randolph Career Academy
6100	Leeds, Morris E. (Jr)
6110	Roosevelt Middle (Amy #6)
6160	Lewis, Ada L.
6200	Day, Anna B.
6201	Day Little School House

ULCS #	SCHOOL
6210	Edmonds, Franklin S.
6220	Emlen, Eleanor C.
6230	Fitler, Edwin H.
6240	Fulton, Robert
6250	Henry, Charles W.
6260	Houston, Henry H.
6270	Jenks, John Story
6280	Kinsey, John L.
6290	Levering, William
6300	Logan
6310	McCloskey, John F.
6320	Mifflin, Thomas
6330	Pastorius, Francis
6340	Pennell, Joseph
6350	Pennypacker, S. W.
6380	Shawmont
6390	Steel, Edward T.
6400	Widener Memorial (Sr)
6406	Widner Barn
6410	Cook-Wissahickon
6430	Wister, John
6440	Lingelbach, Anna L.
6450	Dobson, James
6460	Hill, J. E.
6470	Kelly, John B.
6480	Academy for Middle Years
6540	Lankenau H.S.
6832	Parent Nursery West Side
7010	Frankford High School
7019	Frankford (Athletic Field)
7020	Olney, High (Sr)
7029	Olney High(Athl. Fld)
7030	Philadelphia Military Arsenal (Not Open Yet)
7100	Cooke Jr High
7101	Sheridan West (old CookeAnnex/St. Stephens)
7110	Harding, Warren G. (Jr)
7120	Fels, Samuel S.
7130	Wagner, Gen. Louis (Jr)
7140	New Clemente (Front&Erie)
7200	Barton, Clara
7210	Birney, Gen. David B.
7220	Carnell, Laura H.
7222	Carnell Little School House
7240	Creighton, Thomas
7241	Creighton Little School House

ULCS #	SCHOOL
7250	Edmunds, Henry R.
7251	Edmunds Annex (Frankford Memorial)
7260	Ellwood
7261	Ellwood School Annex (Holy Angels)
7270	Finletter, Thomas
7271	Finletter Little School House
7280	Franklin Elementary
7281	Franklin Annex (Salvation Army Bldg)
7282	Franklin Annex (Pilgram Baptist)
7290	Stearne (Amy)
7300	Hopkinson, Francis
7301	Hopkinson Little School House
7310	Feltonville
7320	Howe, Julia Ward
7330	Lawton, Henry W.
7350	Lowell, James Russell
7360	Marshall, John
7370	Martin, James/AMY 5
7380	McClure, Alex
7390	Morrison, Andrew J.
7392	Morrison Annex B (First Presbyterian)
7400	Olney Elementary
7401	Olney Annex (St. James)
7402	Olney Annex (St. Ambrose)
7420	Smedley, Franklin
7430	Sullivan, James J.
7440	Taylor, Bayard
7441	Taylor Annex
7460	Ziegler, William H.
7461	Ziegler Annex (Mater Doloroso)
7470	Bridesburg
7471	Bridesburg Annex (All Saints)
7490	Prince Hall
7500	Central East MS
7501	Central East MS Annex
7510	Bethune, Mary McLeod
7530	Rowen, William
7540	Feltonville Annex (Horn, G. L.)
7560	Washington, Grover (B&Olney)
7830	Parent Nursery Oak Lane
8010	Lincoln, Abraham (Sr)
8011	Lincoln Annex
8012	Lincon Pool
8019	Lincoln AthleticFieldhouse
8020	Northeast High (Sr)
8029	Northeast High (Athl. Fld.)

ULCS #	SCHOOL
8030	Washington, George (Sr)
8039	Washington, George(Fld)
8090	Swenson Arts & Technology
8120	Wilson, Woodrow (Jr)
8140	Meehan Middle
8150	Rush, Benjamin (Jr) (Moved to Shallcross Site)
8160	Baldi, C.C.A.
8166	Pennypack Environmental (See T022)
8180	Hancock, John
8200	Allen, Ethan
8210	Brown, Joseph H.
8230	Crossan, Kennedy C.
8240	Disston, Hamilton
8250	Forrest, Edwin
8260	Fox Chase
8262	Fox Chase Farm (old T020)
8270	Holme, Thomas
8300	Mayfair
8310	Moore, J. Hampton
8320	Labrum, Gen. J. Harry
8330	Shallcross, Thomas (Jr)(now housing Rush)
8332	Shallcross House (See 8330)
8338	Shallcross - Greentree Mansion (See 8330)
8339	Shallcross Pool (See 8330)
8340	Solis-Cohen, Solomon
8350	Spruance, Gilbert
8351	Spruance Little School House
8360	Rhawnhurst
8370	Comly
8380	Farrell, Louis H.
8390	Fitzpatrick, Aloysius
8400	Frank, Ann (Bustleton Sch.)
8401	Frank Little School House
8410	Pollock, Robert Blair
8420	Decatur, Stephen
8430	Greenberg, Joseph J.
8440	Loesche, William H.
9960	New DeBurgos (4th & Lehigh) (New School)
	TOTALS